

May 26, 2004

Mr. Peter Gold
Water Protection Division
USEPA REGION 3 - 3WP12
1650 Arch Street
Philadelphia, PA 19103-2029

Dear Mr. Gold:

This letter is to submit some additional information in response to your review of the Bacteria TMDL for Reed Creek, Bedford County, Virginia, report originally submitted for your approval on April 22, 2004. Based on your comments, a few corrections have been made in the report.

Regarding your comment on water quality criteria (text under Table 5), the Reed Creek TMDL has been developed using the data of 12 E.coli samples collected on a monthly basis and a 235 cfu/100 mL instantaneous standard.

A few other corrections and clarifications became necessary based on your review of the TMDL report. These have been made in the final report and are summarized in the attached document (Attachment 1).

Peter Gold
Page 2 of 2

I trust that you find this addendum satisfactory and look forward to receiving approval of the bacteria TMDL for Reed Creek. If you have any question or need additional information, please contact me at (804) 698-4521.

Sincerely,

Ram Gupta
TMDL Environmental Specialist II

Attachment

Cc: Charles Martin, DEQ
Jutta Schneider, DEQ
Jason Hill, DEQ
File

Attachment 1 - Response Document on
Bacteria TMDL for Reed Creek, Bedford County, Virginia

Q: The bacterial source tracking loading breakdown in the eighth paragraph of executive summary page iii is incorrect. The values given represent the loading breakdown from Looney Creek.

A: This typo has been corrected.

Q: The text under Table 5 states “Based on the sampling frequency, only one criterion was applied to a particular datum or data set.” Is this statement correct?

A: Yes, the samples used during past assessment periods were collected monthly or bio-monthly, so assessment staff used the instantaneous criteria. Assessment staff will apply the geometric mean standard when appropriate.

Q: The Excel developed figure documenting the flow regression between Piney Run and Reed Creek should be provided in the TMDL.

A: This figure has been added in Appendix D with descriptive text.

Q: Please identify which monitoring station data was used in Table 6.

A: The station ID (2-RED000.16) has been added to the title in Table 6.

Q: The bacteria concentrations within the Creek appear to be diminishing based on the data in Table 6 of the TMDL and the Excel Water Quality Data worksheet. The average e-coli concentration from 2001 through 2004 is approximately 150 cfu/100 ml while the average concentration before this time frame is 450 cfu/100 ml. Is this related to flow or were there best management practices already installed in the watershed?

A: Several factors may explain the difference in the data. Virginia's unusually low flows may be responsible for lower non-point source loads in recent years. One of the largest beef farmer's implemented BMP in the last 5 years. Only one dairy farm remains in the Reed Creek watershed, also.

Q: In the Excel Water Quality Data worksheet, the fecal coliform data from 2002 through 2004 was not converted from the e-coli concentration. Should this be done instead of listing the e-coli concentration for both?

A: The water quality samples collected from 8/29/2002 until 1/29/2004 were analyzed for E.coli data that do not need to be converted. This data is in italics and below the last line is a statement indicating "E.coli in italics".